

# Exhibit F

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JARROD STRINGER, et al.,	*	
Plaintiffs,	*	
	*	
v.	*	No. SA-20-CV-46-OG
	*	
RUTH HUGHS, et al.,	*	
Defendant.	*	

VIDEOTAPED VIDEOCONFERENCED

ORAL DEPOSITION

OF

THE DEMOCRATIC CONGRESSIONAL

CAMPAIGN COMMITTEE REPRESENTATIVE,

JACQUELINE NEWMAN

Tuesday, April 28, 2020

VIDEOTAPED VIDEOCONFERENCED DEPOSITION OF  
JACQUELINE NEWMAN, produced as a witness at the instance  
of the Defendant, and duly sworn, was taken in the  
above-styled and numbered cause on Tuesday, April 28,  
2020, from 10:09 a.m. to 2:05 p.m. Central Time, before  
Debbie D. Cunningham, CSR, in and for the State of  
Texas, remotely reported via Machine Shorthand, pursuant  
to the Federal Rules of Civil Procedure.

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7 Q. And how does the DCCC's support for that kind  
8 of program play out in practice? I mean, I guess, is it  
9 just providing funding? Do you provide manpower as  
10 well, or what other resources do you provide?

11 A. Yeah, so it's all of the above. We provide  
12 funding. We transfer money to the State Party to be  
13 used for the Coordinated Campaign. We also have our own  
14 direct investments in people on the ground in some  
15 cases. In Texas, for example, we have four offices  
16 opened; and we have staff in those offices.  
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1           **Q.     And that's because DCCC doesn't have that**  
2 **information?**

3           A.     Yeah.   And I'm not being deliberately vague  
4 here.   It's most likely -- you know, we kind of see it  
5 all as one bucket of money that is going towards this  
6 cause; and we are, as mentioned before, transferring  
7 money to the Texas Democratic Party for the Coordinated  
8 Campaign where a lot of those voter registration efforts  
9 are taking place.

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5 Q. And how are you able to get such a precise  
6 number for this year's expenditures on voter  
7 registration efforts?

8 A. On the voter registration efforts?

9 Q. Yes.

10 A. Well, the 145K that we have transferred to the  
11 Texas Democratic Party to date, that has all been to the  
12 Coordinated Campaign to support voter registration and  
13 then what we -- what I know we have spent on voter  
14 registration.  
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10 Q. Agreement for nearly \$400,000 for a consultant  
11 to provide voter registration services in Texas  
12 Congressional District 23. That's what you're referring  
13 to?

14 A. Yes.

15 Q. And so what services is that consultant going  
16 to provide?

17 MS. BRANCH: Objection to the extent that  
18 this calls for strategic party information.

19 You may answer at a high level.

20 A. They help us go through our process of  
21 training staff on the ground to try to learn how to  
22 register people to vote in Texas.

23 Q. (BY MR. HILTON) And what does that training  
24 look like?

25 A. I am not very familiar on the details, but I

1 know that all -- anyone who is registering voters in  
2 Texas needs to be trained and deputized in order to do  
3 so.

4 **Q. And who are the staff that you are training,**  
5 **like staff of whom?**

6 A. So it depends, I think. You know, we hired a  
7 consultant who ran some of these efforts that's laid out  
8 in Exhibit 3. In that case the consultant has employees  
9 who are helping this effort in Texas.

10 We have -- with the money that we have  
11 sent to the Texas Democratic Party, I believe at least  
12 two people have been hired with the express purpose of  
13 assisting voter registration efforts.

14 And then we also have staff on the ground  
15 who work directly for the DCCC whose roles involve a lot  
16 of community engagement and help with voter  
17 registration.

18 **Q. Do you know what -- so community engagement**  
19 **and voter registration, are those two different things?**

20 A. I think so. I think maybe community  
21 engagement is an overarching bucket that could involve  
22 voter registration.

1           **Q.   Why is registering voters in Texas important?**

2           A.   Voter registration is important in Texas  
3 because we have several priority targeted races. We  
4 have two -- we call them frontline districts, as well as  
5 a handful of red-to-blue districts, that signify  
6 priority within the DCCC. And registering voters makes  
7 sure that we are broadening the people who are turning  
8 out to vote for these candidates and members of  
9 Congress.



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2 **Q. Who are the members of the DCCC?**

3 MS. BRANCH: Objection to the extent that  
4 this calls for a legal conclusion.

5 But you may answer the question.

6 A. Yeah. I realize now that there's a very legal  
7 definition for the term "member" that I can't  
8 necessarily speak to; but in the DCCC's mind, our  
9 members are members of -- Democratic members of Congress  
10 that are in our caucus.

11 I think that "member" in kind of a  
12 broader term, we also think about Democratic voters as a  
13 whole who participate in any of our activities, whether  
14 it's donating to us or volunteering or supporting and  
15 voting Democratic. You know, those people who we see as  
16 our constituents because we represent them also kind of  
17 sometimes get thrown around as, like, a member; but,  
18 really, it's our members of Congress.

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